LAW OFFICES OF

## Frank D. Camera

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U.S. DISTRICT COURT DISTRICT OF MASS

21 McGrath Hwy. #402 **QUINCY, MA 02169** 617-770-9488 PAGER: 888-969-5935

March 24, 2005

**WA UNITED STATES MAIL** 

Robert Richardson, Esq. United States Attorney's Office One Courthouse Way, Suite 9200 Boston, MA 02210

RE:

United States v. Cory Hubbard CRIMINAL NO. 04-10235 MLW

REQUEST FOR DISCOVERY

Dear Mr. Richardson:

As per our conversation, I will await a call from you verifying the time at which I vall have an opportunity to view and inspect all physical evidence or tangible evidence including but not limited to items seized from Mr. Hubbard's person, the residence that was the target of the search (663 Kempton Street, third floor, New Bedford), and any item(s) that were allegedly in Mr. Hubbard's possession or control that are currently in your possession or control.

I am also requesting that you provide the following:

- Results of finger print analysis that was done in connection with a Glock 40 caliber 1. semi-automatic handgun model #23 with serial number BNM315, which was allegedly confiscated at 663 Kempton Street, third floor, pursuant to the search warrant (04 SW 36);
- 2. Photograph of Defendant, Cory Hubbard, provided by the Massachusetts Registry of Motor Vehicles that was shown to the confidential informant during the week of January 18, 2004, as set forth in the Affidavit in Support of Search Warrant (04 SW 36);
- All documents from the New Bedford Police Department relating to the alleged controlled buy that occurred between the confidential informant and the defendant, including the records of serial numbers of marked bills used in the controlled buy and the contraband produced from the informant to Detective John Ribeiro after the controlled buy occurred;

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- 4. All promises, rewards and inducements made to the confidential informant in connection with "it" providing information to law enforcement;
- The attendance records of Detectives John Ribeiro III, John Encarnacao, and Andrew Simmons of the New Bedford Police Department from January 11, 2005 through February 28, 2005.

Sincerely

Frank D. Camera, Esq.

FDC/mal

cc: Filing Clerk Criminal Business (via U.S. Mail)
Cory Hubbard